

Guy W. Rogers
Jon A. Wilson
Brett C. Jensen
BROWN LAW FIRM, P.C.
315 North 24th Street
P.O. Drawer 849
Billings, MT 59103-0849
Tel. (406) 248-2611
Fax (406) 248-3128

Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc., and Watch Tower Bible and Tract Society of Pennsylvania

Joel M. Taylor, Esq. (appearing *pro hac vice*)
MILLER MCNAMARA & TAYLOR LLP
100 South Bedford Road, Suite 340
Mount Kisco, NY 10549
Telephone/E-Fax: (845) 288-0844

Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc., and Watch Tower Bible and Tract Society of Pennsylvania

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA) Cause No. CV 20-52-BLG-SPW
MAPLEY,)
Plaintiffs,)
vs.)
WATCHTOWER BIBLE AND)
TRACT SOCIETY OF NEW YORK,)
INC., WATCH TOWER BIBLE AND)
TRACT SOCIETY OF)
PENNSYLVANIA, and BRUCE)
MAPLEY SR.,)
Defendants.)

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S NOTICE OF
WITHDRAWAL OF MOTION TO
DISMISS BASED ON LACK OF
PERSONAL JURISDICTION**

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter “WTPA”), by and through its attorneys, and respectfully submits this Notice that it is withdrawing its Motion to Dismiss Pursuant to Rule 12(b)(2), Fed.R.Civ.P. (Doc. 13), along with its supporting materials to include its Brief in Support (Doc. 14), Affidavit of Philip Brumley, Esq. (Doc. 14-1), Reply Brief in Support (Doc. 25), Second Affidavit of Philip Brumley, Esq. (Doc. 26), the jurisdiction allegations contained in its Response in Opposition to Plaintiffs’ Motion to Supplement the Record (Doc. 31), and the jurisdiction allegations contained in its Preliminary Pretrial Statement (Doc. 38). In so doing, WTPA intends to waive its defense of lack of personal jurisdiction in this case, but it expressly reserves all other defenses it may have at law or in equity. WTPA intends to file an Answer within 14-days of the date of this Notice, and it respectfully requests that the Court set a Preliminary Pretrial Conference thereafter.

DATED this 5th day of November, 2021.

By: /s/ Jon A. Wilson
Guy W. Rogers / Jon A. Wilson /
Brett C. Jensen
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*

CERTIFICATE OF SERVICE

I hereby certify that, on November 5, 2021, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans
Ryan R. Shaffer
James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
Missoula, MT 59802
3. Bruce G. Mapley, Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

<u>1, 2</u>	CM/ECF	<u> </u> Fax
<u> </u>	Hand Delivery	<u> </u> E-Mail
<u>3</u>	U.S. Mail	<u> </u> Overnight Delivery Services

By: /s/ Guy W. Rogers
Guy W. Rogers / Jon A. Wilson /
Brett C. Jensen
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*